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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FREDDIE PEARSON, and LEA ANN	)	Case No.: 2:23-cv-01888-APG-MDC
DAILEY, individually, and on behalf of all	)	
others similarly situated,	)	
	)	<b>STIPULATION AND ORDER</b>
Plaintiffs,	)	<b>TO EXTEND TIME FOR</b>
vs.	)	<b>DEFENDANT TO RESPOND</b>
	)	<b>TO REMAINING CLAIMS IN</b>
INTOUCHCX SOLUTIONS, INC.,	)	<b>PLAINTIFFS'</b>
	)	<b>SECOND AMENDED COMPLAINT</b>
Defendant.	)	<b>(FIRST REQUEST)</b>

IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record that Defendant INTOUCHCX SOLUTIONS, INC. ("Defendant") will have an extension of time, up to and including November 7, 2024, to respond to the remaining claims of Plaintiffs Freddie Pearson and Lea Ann Dailey's (together, "Plaintiffs") Second Amended Collective and Class Action Complaint With Jury Demand (ECF No. 26) (the "SAC"). The Court recently ruled on Defendant's Motion to Dismiss, granting Defendant's motion in part and denying Defendant's motion in part with respect to certain of Plaintiffs' claims in their SAC (ECF No. 45). As part of that

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Order, the Court further granted Plaintiffs until October 18, 2024 to file a third amended Complaint correcting the deficiencies found in the SAC. This extension is sought in an effort to maximize efficiency.

Accordingly, this stipulated extension is sought in good faith. This is the second request for an extension of the deadline to respond to Plaintiffs' SAC on behalf of Defendant.

Dated this 7th day of October, 2024.

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### **ORDER**

IT IS SO ORDERED:

\_\_\_\_\_  
Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

DATE: 10/9/2024